REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

The rejection of all pending claims 1-5, 7-11, 13-27, 29-33 and 35-46 under 35 U.S.C. §102(e) as allegedly anticipated by Coffman '174 is again respectfully traversed. It appears that the Examiner's statements allegedly supporting this ground of rejection are merely *verbatim* word-processing copies of text used in earlier office actions. Accordingly, so as not to unduly burden the record at this point, applicants hereby incorporate by reference all earlier argued detailed reasons for such traversal already of record.

The Examiner is thanked for providing a detailed response to arguments which has assisted in understanding the Examiner's point of view. However, re-reading Coffman in the light of the Examiner's comments still reveals a number of significant features of the applicants' claims that are clearly not described by Coffman. Some examples are noted in detail below.

A. STORAGE/ UPDATING OF I/O DATA TYPES

The Examiner's responsive comments misquote Coffman – and merge text from two unrelated sections (paragraph [0098] describing Fig. 5 and DMS components and paragraph [0166] describing Fig. 9 under I/O management) to imply (with hindsight) a teaching that is actually not supported by the text as set out in Coffman.

From paragraph [0098], the Examiner quotes:

> "the short term history stores information at the level of each sate [sic: state] in a dialog, the long term history would store information at the level of the entire dialog."

This passage is part of a section (starting at paragraph [0093]) directed to components of the Dialog Manager and Arbitrator (DMA) that are utilized for providing bookkeeping services, including the aDMA short-term memory, described at paragraph [0096].

The Examiner seeks to combine the above text from paragraph [0098] with the following text from paragraph [0166]:

> "[t]he I/O manager 200 can modify and produce outputs through DOM commands that update the state and presentation of the browser 205."

To put this quotation in context, paragraph [0166] relates to an I/O manager – rather than an interactive dialogue apparatus, as required by applicants' claim 1. As illustrated in Fig. 6 of Coffman, the Coffman I/O manager 83 is distinct from the Coffman dialog managers and arbitrators 81, 82.

The Coffman I/O manager is defined at paragraph [0101] as the component that interfaces with all input and output devices. In particular, the I/O manager sends input notification events to the DMA and presents to users the output requests sent through the DMA. Hence, the I/O manager is a conduit for messages originating in the DMA on

one side and messages originating in the I/O devices on the other side. It is the DMAs (rather than the I/O manager) that handle the dialog, with the rDMA handling the main dialog while the aDMAs handle user access sub-dialogs (as described at paragraph [0090]).

The Examiner has misinterpreted this passage as teaching an I/O manager modifying the state of the dialog, whereas what is described, as a matter of fact, is that it is the state of the browser that is updated. There is no reference in this passage to the state of the dialog described in the passage quoted from paragraph [0098]. In fact, as demonstrated above, the Coffman I/O manager does not deal with the dialog, but rather acts as a mere conduit for messages. The Examiner is, therefore, in error in trying to combine the action of the I/O manager of paragraph [0166] with the state of the dialog of paragraph [0098].

The Examiner argues that the description of the I/O manager modifying and producing outputs that update the state of the dialog [sic: browser] "implies" dynamically updating input and output data [presumably, the Examiner intended to refer here to the "input and output *type* data" of applicants' claim 1] when any of said one or more properties change; and/or output prompts are sent; and/or input responses are received. The Examiner does not, however, explain what aspect of Coffman corresponds, in his view, to the "input and output type data" of applicants' claim 1, but

seems to be merely repeating the wording of applicants' claim 1 without establishing any correspondence to the quoted passage from Coffman.

B. USER PREFERENCE

The Examiner has also maintained the argument that Coffman at paragraph [0175] teaches an interactive dialogue apparatus (as claimed in applicants' claim 1) comprising means for establishing a user preference value for each input and output port from properties, said properties comprising the utilization made by a user of each input and output port.

In more detail, the Examiner argues that the following text from Coffman teaches establishing a user preference value for each port:

> "The user may interact with the different applications offered by the portal based on, e.g., a list of applications subscribed by the user, user preference or user past history, or simply the result of the evolution of the interaction of the user with the Portal."

However, what Coffman is describing here is the user, not an interactive dialogue apparatus, interacting according to the user's own preferences. This is clearly stated, i.e., "***[t]he user may interact*** *with the different applications offered by the portal* ***based on****, e.g., a list of applications subscribed by the user,* ***user preference****..." [emphasis added].

In order to move the examination process forward, the Examiner is requested to recognize and accept that there is no teaching in Coffman whether explicit or, as suggested by the Examiner, implicit, of the interactive dialogue apparatus itself establishing a preference value for a port. The section of Coffman quoted by the Examiner simply teaches a user having the freedom to act according to his/her own preferences. This has no correspondence with any feature of applicants' claim 1 which is restricted to an interactive dialogue apparatus comprising means for itself independently establishing a user preference value for each input and output port.

The present inventors have improved on systems like that described in Coffman by providing an interactive dialogue apparatus which is itself capable of establishing user preference values from an analysis of user behavior. Specifically, user preferences are established according to the present invention on the basis of the utilization made by each user of each input and output port. This is not described in Coffman.

C. PROPERTIES

The Examiner alleges that the following requirement set out in applicants' claim 1:

> "wherein one of said properties is the utilization made by a user of each input and output port"

is taught by the following passage from Coffman at paragraph [0153] [sic: [0173]]:

> "user may interact with the different applications offered by the portal based on, e.g., a list of applications subscribed by the user, user preference."

This passage is from yet another section of Coffman – this one being directed to a voice or conversational portal as illustrated in Fig. 10. Coffman refers here to a "portal," but no reference can be found in this passage to a "port". As explained in the last sentence of paragraph [0176], the portal is synonymous with the rDMA (a dialog arbitrator). Applicants' claim 1 is restricted to an interactive dialogue apparatus comprising means for processing input responses and determining a suitable output prompt to be output from at least one of said output ports. The ports of applicants' claim 1 are means for inputting and outputting messages (i.e., input responses and output prompts), not dialog arbitrators. There is no overlap between the definition of "portal" in Coffman and the ports of applicants' claim 1. There is no teaching in Coffman of properties comprising the utilization made by a user of each input and output port required by applicants' claim 1.

CONCLUSION

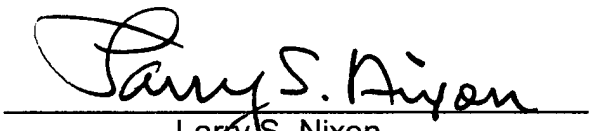
As set out above, clear and significant differences exist between the dialog management arrangement of Coffman and the interactive dialogue apparatus required by applicants' claim 1.

The above-noted deficiencies of Coffman with respect to independent claim 1 are also deficiencies with respect to independent claims 2, 23 and 24. All other claims depend directly or indirectly upon one of these independent claims. Accordingly, it is not necessary at this time to detail additional deficiencies of Coffman with respect to other aspects of the rejected claims. Suffice it to note that, as a matter of law, it is impossible for a reference to anticipate any claim unless it teaches each and every feature of such claim.

Accordingly, this entire application is now believed to be in allowable condition, and a formal notice to that effect is earnestly solicited.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: 

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